

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Establishment of an Advisory Committee)
for the Development and Implementation)
of an Electronic Filing System)

CC Docket No. 94-18

To: The Commission

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT), by its attorneys, respectfully files these Comments in response to the Commission's March 7, 1994, Public Notice, (Notice), FCC 94-44. In this Notice, the Commission requests comments on the establishment of an advisory committee to assist the Common Carrier Bureau in the development and implementation of an electronic filing system. The Commission further requests comments on the scope of that committee's deliberations. SWBT supports the formation of this advisory committee and the development of a system that will allow electronic filing, storage and retrieval of information received or created by the Commission.

I. SWBT SUPPORTS THE FORMATION OF THE ADVISORY COMMITTEE AND WOULD LIKE TO PARTICIPATE ON THIS COMMITTEE.

SWBT supports the establishment of an advisory committee to investigate and develop a system for the electronic filing, storage, and retrieval of information in the public record,¹

¹ Documents filed pursuant to the Freedom of Information Act should not be electronically transmitted or stored until such time as the advisory committee or the Commission proposes an electronic system which would safeguard the confidentiality of such a filing.

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including tariff filings, complaints, and petitions, received by the Commission from all carriers and end users. In addition, the system should also have the capability to provide for electronic filing, storage, and retrieval of all information created by the Commission, including orders of the Commission or Bureaus. Such a system would reduce the enormous amount of paper traded between the Commission and the carriers and would provide faster access to all documents filed with the Commission. It would also represent a significant step toward the administration's goal of developing the "information superhighway."

SWBT recommends that all interested parties be allowed to participate on this committee, particularly those parties who routinely file information with the Commission. In that regard, SWBT would like to take part in this process of developing and implementing an electronic filing system for use by the Commission and all carriers, by participating on the advisory committee.

II. SWBT RECOMMENDS THAT THE ADVISORY COMMITTEE ESTABLISH STANDARDS FOR THE ELECTRONIC FILING SYSTEM.

SWBT recommends that, in addition to those items specifically listed in the Notice, the advisory committee develop and establish a standard electronic format for documents received or created by the Commission. The committee should also propose a standard definition of what the Commission means by "electronic transmission" since such a term may imply filing via diskette or filing via some telecommunications method. Standards are critical if the electronic filing system is to be effective and efficient --

an improvement over manual methods. The committee may find that consultation with industry standards organizations may be useful during this process.

SWBT recognizes that not all parties will have the capability to electronically transmit information and suggests that the committee propose a process for converting any such filing to a compatible format which can then be filed electronically. If the entire system is to be useful, all parties must be able to file electronically or have their filings converted to an electronic format.

III. SWBT RECOMMENDS THAT THE ADVISORY COMMITTEE DEVELOP A MEANS TO PERPETUALLY FUND THE IMPLEMENTATION AND OPERATION OF THE ELECTRONIC FILING SYSTEM.

SWBT strongly recommends that the committee focus on the normal appropriation process to fund the development, implementation, and operation of any electronic filing system. If additional funding is necessary, the cost should be shared by all those who utilize the system, either by transmitting information to the Commission or by retrieving stored information from an on-line database. No specific party or industry group should be forced to pay a lion's share of the cost when all industry groups will receive benefits from such a system.

IV. THE COMMITTEE SHOULD FORMULATE PROPOSED CHANGES TO THE COMMISSION'S RULES TO IMPLEMENT ELECTRONIC FILING.

The mandatory use by all parties of any electronic filing system developed by the committee would require changes in the Commission's rules. The committee should, in conjunction with

industry participants, formulate proposed rule changes for use by the Commission in a formal rulemaking proceeding on electronic filing. Such a rulemaking proceeding would give all interested parties the chance to comment on and propose alternatives to suggested rule revisions.

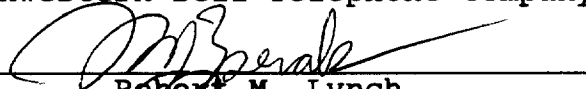
V. CONCLUSION

SWBT supports the formation of an advisory committee to assist in the development and implementation of an electronic filing system that would be used by all parties for the filing, storage and retrieval of information provided to or by the Commission. The advisory committee should develop various standards related to electronic filing and the funding of such a system as well as propose the specific rule changes necessary for its implementation.

Respectfully submitted,

Southwestern Bell Telephone Company

By



Robert M. Lynch
Richard C. Hartgrove
Michael J. Zpevak

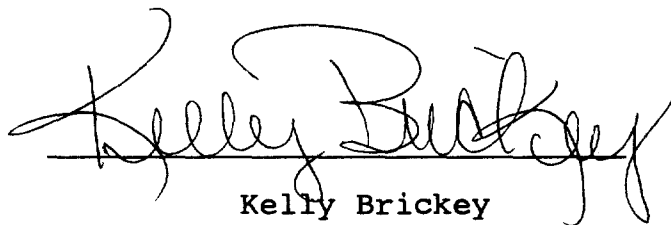
Attorneys for
Southwestern Bell Telephone Company

One Bell Center, Room 3520
St. Louis, Missouri 63101
(314) 235-2507

April 1, 1994

CERTIFICATE OF SERVICE

I, Kelly Brickey, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company" has been served this 1st day of April, 1994 to the Parties of Record.


Kelly Brickey

April 1, 1994

FCC
Office of the Secretary
Common Carrier Bureau
1919 M Street, N.W.
Room 222
Washington, DC 20554

ITS, Inc.
1919 M Street, N.W.
Suite 246
Washington, DC 20554